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January 30, 2025

VIA ELECTRONIC CASE FILING

The Honorable Judge Julien X. Neals
United States District Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street #4015
Newark, New Jersey 07102

Re: The Roman Catholic Diocese of Paterson, New Jersey, et al. v. United States Department of State, et al., Case 2:24-cv-08350-JXN-MAH

Dear Judge Neals:

This Firm now acts as Counsel for Plaintiffs, the Roman Catholic Diocese of Paterson, New Jersey, Father Manuel Alejandro Cuellar Ceballos, Father Regin Nico Dela Cruz Quintos, Father Joemin Kharlo Chong Parinas, Father Armando Diaz Vizcara Jr., and Father Joseph Aguila Mactal ("Plaintiffs").

On November 11, 2024, Plaintiffs filed with the Court a Motion to Stay All Proceedings Through and Including December 31, 2024 (the "Motion"). ECF No. 18. Defendants, United States Department of State, United States Department of Homeland Security, United States Citizenship and Immigration Services, Antony Blinken, in his official capacity as Secretary of the United States Department of State, Alejandro Mayorkas, in his official capacity as Secretary of the United States Department of Homeland Security, and Ur Mendoza Jaddou, in her official capacity as Director of United States Citizenship and Immigration Services ("Defendants"), did not oppose the Motion. Id.

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On December 12, 2024, the Court granted the Motion and ordered a stay of all proceedings up to and including December 31, 2024. ECF No. 19. The Court further ordered the filing of a status report no later than December 16, 2024. Id.

The Status Report was filed, and, on December 18, 2024, the Court ordered the filing of a second status report no later than December 30, 2024. ECF. Nos. 22, 23. Plaintiffs, after consultation with Counsel for Defendants, submitted a second letter Status Report on December 30, 2024. ECF No. 24.

On December 30, 2024, Plaintiffs filed with the Court an Unopposed Motion to further Stay All Proceedings Through and Including March 31, 2025 (the "Motion 2"). ECF No. 25. Defendants did not oppose the Motion. Id.

On December 31, 2024, the Court granted Motion 2 and ordered a stay of all proceedings up to and including March 31, 2025. ECF No. 26. The Court further ordered the filing of a status report no later than February 1, 2025, and further stated that if the matter is not settled, a joint status report must be filed every two weeks until the report of the matter as settled, or parties are unable to do so by March 31, 2025. Id. Plaintiffs, through consultation with Counsel for Defendants, now submit this third letter Status Report.

Plaintiffs report that as of today, there is no change in the previously reported status. Defendants state that they continue to have no independent knowledge of Plaintiffs' efforts to resolve the case but do not oppose the continued stay of this matter while Plaintiffs pursue a potential non-litigation resolution.

Unless the Court otherwise orders, Plaintiffs will file a fourth status report on February 14, 2025. Should a resolution rendering Plaintiffs' Complaint moot occur prior to February 14, 2025, Plaintiffs will so inform the Court.

Very Truly Yours,

LAHOUD LAW GROUP, P.C.

/s/ Daniel J. Baurkot
Daniel J. Baurkot, Esquire
Attorneys for Plaintiff

DJB:RGL:rc

cc: Counsel of Defendants (via ECF)